

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION**

JESSICA GUASTO,

Plaintiff,

CASE NO.: 1:22-cv-21004-MD

vs.

THE CITY OF MIAMI BEACH, FL,
a Florida municipality,

Defendant

**PLAINTIFF’S MOTION FOR EXTENSION OF TIME TO
RESPOND TO DEFENDANT’S MOTION FOR SUMMARY JUDGMENT**

Plaintiff, JESSICA GUASTO (“Plaintiff”), by and through her undersigned counsel, hereby moves this Court for an extension of time of twenty-one (21) days, up to and including July 8, 2024, to respond to Defendant’s Case Dispositive Motion for Summary Judgment and Supporting Memorandum of Law (“Defendant’s Motion”) [D.E. 70], and in support states as follows:

1. On June 3, 2024, Defendant filed its Dispositive Motion for Summary Judgment and Supporting Memorandum of Law.
2. Pursuant to Local Rule 7.1(c), Plaintiff’s response to Defendant’s Motion is currently due on or before June 17, 2024.
3. The Court may grant an extension of time upon a showing of good cause. Fed. R. Civ. P. 6(b).
4. Due to the voluminous record in this case and the complexity of the issues presented, Plaintiff requires additional time to properly review Defendant’s Motion and prepare

her response. Defendant's Motion and Statement of Material Facts comprise nearly 2,000 pages of exhibits, in addition to other record materials that must be reviewed in order for Plaintiff to provide a complete response.

5. Accordingly, Plaintiff respectfully requests an extension of time of twenty-one (21) days, up to and including July 8, 2024, to respond to Defendant's Motion.

6. Plaintiff's request is made in the interest of justice, as an extension will ensure Plaintiff's arguments and the record evidence in support are fully presented to the Court.

7. This motion is not made for the purposes of delay and Defendant will not be prejudiced by the extension of time.

WHEREFORE, Plaintiff respectfully requests an extension of time of twenty-one (21) days, up to and including July 8, 2024, to respond to Defendant's Case Dispositive Motion for Summary Judgment and Supporting Memorandum of Law.

CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 7.1(a)(3)

Undersigned counsel has conferred with counsel for the Defendant, who has advised that the Defendant opposes the relief sought herein. Counsel for the Defendant has further advised that the Defendant would not oppose a request for an extension of 10 days.

Dated: Miami, Florida
June 4, 2024

DEREK SMITH LAW GROUP, PLLC
Counsel for Plaintiff

/s/ Daniel J. Barroukh
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing document is being served on June 4, 2024, on all counsel of record on the service list below via CM/ECF.

By: /s/ Daniel J. Barroukh
Daniel J. Barroukh, Esq.

SERVICE LIST

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